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DOC #:

DATE FILED: 6/30/16

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June 28, 2016

VIA ELECTRONIC FILING

Hon. Richard M. Berman, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

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**Re: Walter Noel, IV, on behalf of himself and
similarly situated individuals v. Laidlaw
& Company, Ltd.
Case No.: 16-CV-03975 (RMB) (DCF)**

Dear Judge Berman:

This firm represents Defendant Laidlaw & Company, Ltd. ("Defendant") in connection with the above-referenced matter. We write to request an adjournment of the Initial Pretrial Conference currently scheduled for July 5, 2016 at 9:30 a.m.

This is Defendant's first request for an adjournment of the Initial Pretrial Conference. Defendant submits this request in light of Defendant's counsel's recent retention and upcoming holiday schedule, as well as Defendant's pending request for an extension of time to respond to the complaint through and including July 23, 2016. Counsel for Plaintiff Walter Noel, IV, on behalf of himself and similarly situated individuals, consents to Defendant's request. If granted, the requested adjournment should not impact any other scheduled dates reflected on the Court's docket.

Thank you for your attention to this matter. We are available at the Court's convenience should you require any additional information.

Respectfully submitted,
JACKSON LEWIS P.C.

/s/

Wendy J. Mellk

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jackson lewis

cc: Attorneys at Law
Walker G. Harman, Jr. (via ECF)
Edgar M. Rivera (via ECF)
Tania J. Mistretta (JL - via ECF)

Initial Pre-trial
conference adjourned until
7/14/16 C 11:00